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21  
22 **IN THE UNITED STATES DISTRICT COURT**  
23 **FOR THE DISTRICT OF ARIZONA**

24 Mi Familia Vota, et al.,  
25 Plaintiffs,  
26 v.  
27 Katie Hobbs, et al.,  
28 Defendants,  
and

Republican National Committee;  
National Republican Senatorial  
Committee; Republican Party of  
Arizona; Gila County Republican Party;  
and Mohave County Republican Central  
Committee,  
[Proposed] Intervenor-Defendants.

Case No: 2:22-cv-00509-SRB

**[PROPOSED] ANSWER OF  
[PROPOSED] INTERVENOR-  
DEFENDANTS**

Intervenors—the Republican National Committee, National Republican Senatorial Committee, Republican Party of Arizona, Gila County Republican Committee, and Mohave County Republican Central Committee—now answer Plaintiffs’ complaint (Doc. 1). Unless expressly admitted below, every allegation in the complaint is denied. When Intervenors say something “speaks for itself,” they mean that they lack sufficient information to admit or deny the allegation. Because Plaintiffs often cite nothing, Intervenors do not know whether the referenced factual material exists, is accurate, or is placed in proper context. Accordingly, Intervenors state:

1. Legal argument requiring no response; otherwise, deny.
2. Legal argument requiring no response.
3. Legal argument requiring no response.
4. Voter statistics speak for themselves; otherwise, deny.
5. Officials’ statements and allegations in lawsuits speak for themselves; Intervenors lack sufficient knowledge to admit or deny the remaining allegations.
6. Legal argument requiring no response.
7. Legal argument requiring no response.
8. Legal argument requiring no response.
9. Admit.
10. Admit.
11. Admit.
12. Admit.
13. Legal argument requiring no response.
14. Intervenors lack sufficient knowledge to admit or deny.
15. Intervenors lack sufficient knowledge to admit or deny.
16. Intervenors lack sufficient knowledge to admit or deny.
17. Admit that Defendant Hobbs is Secretary of State of Arizona; the rest is legal argument requiring no response.

1           18. Admit that Defendant Brnovich is the Attorney General of Arizona; the rest  
2 is legal argument requiring no response.

3           19. Legal argument requiring no response.

4           20. Admit.

5           21. Admit.

6           22. Admit.

7           23. Admit.

8           24. Admit.

9           25. Admit.

10          26. Admit.

11          27. Admit.

12          28. Admit.

13          29. Admit.

14          30. Admit.

15          31. Admit.

16          32. Admit.

17          33. Admit.

18          34. Admit.

19          35. Deny.

20          36. Legal argument requiring no response.

21          37. Legal argument requiring no response.

22          38. Legal argument requiring no response.

23          39. Legal argument requiring no response; otherwise, deny.

24          40. The litigation history and allegations speak for themselves; the rest is legal  
25 argument requiring no response.

26          41. Intervenors lack sufficient knowledge to admit or deny.

27          42. Intervenors lack sufficient knowledge to admit or deny.

28          43. Intervenors lack sufficient knowledge to admit or deny.

- 1 44. Intervenors lack sufficient knowledge to admit or deny.
- 2 45. Intervenors lack sufficient knowledge to admit or deny.
- 3 46. Intervenors lack sufficient knowledge to admit or deny.
- 4 47. Intervenors lack sufficient knowledge to admit or deny.
- 5 48. Intervenors lack sufficient knowledge to admit or deny.
- 6 49. Intervenors lack sufficient knowledge to admit or deny.
- 7 50. Legal argument requiring no response; otherwise, Intervenors lack sufficient
- 8 knowledge to admit or deny.
- 9 51. Legal argument requiring no response.
- 10 52. Intervenors lack sufficient knowledge to admit or deny.
- 11 53. Deny as to the final sentence; the rest is legislative background which speaks
- 12 for itself.
- 13 54. Legal argument requiring no response.
- 14 55. Legal argument requiring no response.
- 15 56. Legal argument requiring no response.
- 16 57. Legal argument requiring no response.
- 17 58. Legal argument requiring no response.
- 18 59. Legal argument requiring no response.
- 19 60. Legal argument requiring no response.
- 20 61. Legal argument requiring no response.
- 21 62. Legal argument requiring no response.
- 22 63. Legal argument requiring no response.
- 23 64. Legal argument requiring no response; otherwise, deny.
- 24 65. Legal argument requiring no response.
- 25 66. Legal argument requiring no response.
- 26 67. Legal argument requiring no response.

27 **CLAIMS**

28 **Count I: Unjustifiable Burden on the Right to Vote**  
**U.S. Const. amend. I, XIV, 42 U.S.C. §1983**

1           68. Intervenor-Defendants incorporate by reference all foregoing responses to  
2 Plaintiffs' allegations as though fully set forth in this paragraph.

3           69. Legal argument requiring no response.

4           70. Legal argument requiring no response.

5           71. Legal argument requiring no response.

6           72. Legal argument requiring no response.

7                           **Count II: Denial of Procedural Due Process**  
8                           **U.S. Const. amend. XIV, 42 U.S.C. § 1983**

9           73. Intervenor-Defendants incorporate by reference all foregoing responses to  
10 Plaintiffs' allegations as though fully set forth in this paragraph.

11           74. Legal argument requiring no response.

12           75. Legal argument requiring no response.

13           76. Legal argument requiring no response.

14           77. Legal argument requiring no response.

15                           **RESPONSE TO PRAYER FOR RELIEF**

16           Intervenors deny that Plaintiff is entitled to any relief.

17                           **AFFIRMATIVE DEFENSES**

18           1. The allegations in the complaint fail to state a claim.

19           2. Plaintiffs' requested relief is barred by the *Purcell* principle.  
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1 Respectfully submitted on May 12, 2022.

2  
3 By: /s/ Kory Langhofer

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